February 4, 2005

Attn: Kenneth Blodgett
STB Docket No. FD 30186 (Sub-No.3)
Surface Transportation Board
Washington, D.C. 20423-0001

Re: World Wildlife Fund comments on Draft Supplemental Environmental Impact Statement on Tongue River III.

Dear Mr. Blodgett:

The Tongue River III Draft Supplemental Environmental Impact Statement (DSEIS) was recently brought to the attention of World Wildlife Fund (WWF). WWF appreciates your willingness to consider our comments at this time. In addition, after an opportunity to thoroughly review the DSEIS, WWF may submit additional comments by the end of February.

WWF opposes the railroad because it will cause habitat degradation and fragmentation of prairie and streams within an ecoregion, the Northern Great Plains, that WWF has designated a "Global 200", a designation that places it among some 200 ecoregions globally that are most important for saving the diversity of life on Earth. The Northern Great Plains Ecoregion covers the region of mixed-grass prairie of Montana, North and South Dakota, Wyoming, Nebraska, Alberta and Saskatchewan. WWF-US has designated the Northern Great Plains as one of its six priority ecoregions for action because of the urgency and potential for conserving biodiversity in this vast grassland region. In addition, analyses by the World Conservation Union has concluded that temperate grasslands, of which the Northern Great Plains, including the Tongue River region, are part, are the least protected terrestrial biome on Earth.

WWF, in collaboration with 15 other local, regional and national nonprofit organizations, completed in 2004 a conservation assessment of the Northern Great Plains, which included a comprehensive analysis of conservation priorities and threats to biodiversity in the region (S.C. Forrest, H. Strand, W.H. Haskins, C. Freese, J. Proctor and E. Dinerstein. 2004. *Ocean of Grass: A Conservation Assessment for the Northern Great Plains*. Northern Plains Conservation Network and Northern Great Plains Ecoregion, WWF-US, Bozeman, MT). Similar to the World Conservation Union's global finding regarding temperate grassland protection, we found that less than 1.5% of the Northern Great Plains consists of areas where biodiversity conservation is the primary goal. Our assessment also included a thorough review of biodiversity analyses of the Northern Great Plains conducted by other institutions. One of the most thorough was by The Nature Conservancy titled *Ecoregion Planning in the Northern Great Plains Steppe* (Northern Great Plains Steppe Ecoregional Planning Team, February 4, 1999). Within the Northern Great Plains Steppe (essentially identical geographical coverage as WWF's Northern Great Plains Ecoregion), TNC identified the Wolf Mountains/Northern Cheyenne site,

which includes roughly the upper two-thirds of the Tongue River drainage in Montana, as "high priority" for biodiversity conservation. Only about a dozen sites received such designation in the vast 5-state, 2-province region. The WWF assessment supported this conclusion: Our analysis showed that much of this site, including the southern reaches of the Tongue River area in Montana, fell within our top 30% biodiversity ranking for the Northern Great Plains because of habitat intactness and diversity of species and habitats. In addition, reflecting lack-of-data concerns raised in comments by the Northern Plains Resource Council, the TNC assessment rated the level of biodiversity inventory information available for the site as "low" and concluded that "additional inventory for natural communities and species is needed" (p. 180).

Another analysis being conducted by Montana's Department of Fish, Wildlife & Parks also points to the biodiversity importance of the Tongue River Valley. Montana's draft Wildlife Conservation Management Strategy, being funded under a nation-wide federal program for identifying wildlife conservation priorities in the 50 states, has ranked the region encompassing the Tongue River Valley as a Terrestrial Priority #1 in a three-tiered priority system, with 1 being highest and 3 lowest, and it has ranked both the Upper Tongue River and Lower Tongue River as Aquatic Priority #1. The final Wildlife Conservation Management Strategy for Montana is due in October 2005.

WWF concluded in our assessment that the most serious threats to biodiversity conservation in the Northern Great Plains ecoregion include, among others factors, oil and gas development, invasive non-native species and disease, alteration of aquatic regimes, and habitat fragmentation. We believe Tongue River III will directly contribute to and (or) indirectly exacerbate all of these threats.

Habitat fragmentation by the railroad and its construction and maintenance roads can be especially detrimental to native plants and animals. Roads and railroads provide avenues for introduction of invasive species and increase the likelihood of human/wildlife conflicts (Forman, R.T.T., and L. Alexander. 1998. Roads and their major ecological effects. *Annual Review of Ecology and Systematics* 29:207-231; Gelbard, J.L. and J. Belnap. 2003. Roads act as conduits for exotic plant invasion in a semiarid landscape. *Conservation Biology* 17:420-432). For example, Sprague's pipit, a grassland-obligate bird that is a Montana "Species of Concern" because of declining populations, has been found to have lower abundance along roads, which may be attributable to the 20-30% reduction of suitable habitat associated with road rights-of-way within a 100-meter radius (Sutter, G.C., S.K. Davis, and D.C. Duncan. 2000. Grassland songbird abundance along roads and trails in southern Saskatchewan. *Journal of Field Ornithology* 71:110-116). Apart from the effects on large mammal movements and mortality, roads and railroads may also be barriers to small mammal movements (Licht, D.S. 1997. *Ecology and Economics of the Great Plains*. Univ. of Nebraska Press, Lincoln. 225 pp). Related to this point, the Tongue River Valley of Montana shows historic occurrences of the black-footed ferret, North America's most endangered mammal. Because black-tailed prairie dogs and suitable habitat are still found in the region, the Tongue River Valley has recently been proposed as a focal area for black-footed ferret restoration (Proctor, J., S.C. Forrest, and B. Haskins. In press. Identifying potential focal areas for black-tailed prairie

dog restoration. J. Hoagland, ed., *Island Press*). The construction, maintenance and disturbance associated with the railroad could seriously jeopardize the suitability of the area for ferret restoration.

We have read the comments submitted by the Northern Plains Resource Council and by Denise and Phil Wood and Walter and Victoria Baler. WWF fully concurs with the numerous concerns described in both comments regarding the largely unknown, but potentially serious, impacts of the proposed railroad on wildlife and the environment of the Tongue River Valley. The impacts of the railroad's construction and use could have far-reaching effects on wildlife movement patterns, water flow and quality, noxious weed dispersal, levels of environmental contaminants, and the overall environmental quality and quality of life in the Tongue River Valley and adjacent areas. These concerns are of particular importance in a grassland region such as the Tongue River where much of the prairie is still intact (untilled) and, except for a few species, still harbors all the plant and animal diversity that occurred here 200 years ago.

The DSIES for Tongue River III is clearly inadequate. WWF believes a new EIS is required for railroad construction along the entire length of the Tongue River. The current DSIES has overlooked the high biodiversity value of the Tongue River Valley and, consequently, has underestimated the potentially severe negative impacts that railroad construction and traffic would have on both the Tongue River ecosystem and the environmental amenities the region offers to its residents, to the citizens of Montana, and to the U.S. public.

Respectfully submitted,

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